

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
 Plaintiff,)
)
vs.) Case No.: 4:14-cr-153 ERW
)
JAMES STALEY,)
)
 Defendant.)

FIRST MOTION TO CONTINUE SELF SURRENDER DATE

COMES NOW Defendant, James Staley, by and through counsel, and hereby moves this Court to continue his self-surrender date to the Bureau of Prisons from October 6, 2015 at 1:00 p.m. to November 6, 2015 at 1:00 p.m. In support of this motion, Defendant states as follows:

1. On August 19, 2015, this Court sentenced Defendant to 84 months in the Bureau of Prisons.
2. Defendant received notice from the United States Marshals Service directing him to surrender to the Bureau of Prisons facility in Marion, Illinois on October 6, 2015 by 1:00 p.m.
3. Defendant is the director of Passion for Truth Ministries which employs 17 people and reaches thousands of congregants.
4. Defendant is currently in the process of transitioning various roles and responsibilities to others within his organization. This process, however, is a tedious one that requires Defendant's input in all facets of the business structure.
5. Defendant hopes to achieve a significant portion of those tasks during the church event for which he recently received Court approval to travel to Bond County, Illinois.

6. Defendant, however, has other matters to tend to including the completion of financial paperwork as requested by the Financial Litigation Unit of the United States Attorney's Office.

7. Finally, Defendant is in the process of assisting his wife and six daughters move to a new residence, which is an especially large undertaking for a family of eight. The task would surely become even more overwhelming for his family if Defendant was in custody and unable to assist.

8. Defendant requests additional time to handle both professional and personal affairs prior to his surrender to the Bureau of Prisons.

9. Defendant understands he will have to surrender to the Bureau of Prisons shortly and that any continuance on this Court may grant will not reduce the total amount of time he must serve.

10. Defendant, through counsel, has discussed this matter with Assistant United States Attorney Dianna Collins. Ms. Collins objects to Defendant's request.

WHEREFORE, Defendant respectfully requests this Honorable Court continue his self-surrender date to the Bureau of Prisons from October 6, 2015 at 1:00 p.m. to November 6, 2015 at 1:00 p.m.

Respectfully submitted,

ROSENBLUM, SCHWARTZ, ROGERS & GLASS, PC

By: /S/ Marc Johnson
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CERTIFICATE OF SERVICE

I hereby certify that on September 14, 2015, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Ms. Dianna Collins, Assistant United States Attorney.